

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

ROBERT W. HUBER, JR.

Plaintiff,

Case No.: 16-CV-019

v.

GLORIA ANDERSON, ELIZABETH HARTMANN,
MIKE WALCZAK, NIOMI BOCK, KATHY WALTER
and ALLAN KASPRZAK,

Defendants.

**DECLARATION OF NATHANIEL CADE, JR. IN OPPOSITION
TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

Pursuant to 28 U.S.C. § 1746, the undersigned, Nathaniel Cade, Jr., makes the following statements under penalty of perjury under the laws of the United States.

1. I am an attorney duly licensed to practice law in the State of Wisconsin and before this Court.
2. I represent Plaintiff Robert W. Huber, Jr. in the above-captioned case.
3. This Declaration is made in opposition to Defendants' Motion for Summary Judgment.
4. Sandra Hansen, a Wisconsin Department of Corrections (DOC) employee was deposed on May 5, 2019. Attached hereto and incorporated herein as **Exhibit A** is a true and correct copy of her deposition transcript, and **Exhibit 1** from that deposition.
5. Defendant Allan Kasprzak was deposed on May 14, 2019. Attached hereto and incorporated herein as **Exhibit B** is a true and correct copy of his deposition transcript, and **Exhibits 3-6, and 9** from that deposition.

6. Defendant Elizabeth Hartman was deposed on May 17, 2019. Attached hereto and incorporated herein as **Exhibit C** is a true and correct copy of her deposition transcript, and **Exhibits 11-15** from that deposition.

7. Defendant Kathy Walter was deposed on May 17, 2019. Attached hereto and incorporated herein as **Exhibit D** is a true and correct copy of her deposition transcript, and **Exhibits 17-18** from that deposition.

8. Defendant Niomi Bock was deposed on June 19, 2019. Attached hereto and incorporated herein as **Exhibit E** is a true and correct copy of her deposition transcript, and **Exhibits 21-27, 29, and 32** from that deposition.

9. Defendant Gloria Anderson was deposed on July 9, 2019. Attached hereto and incorporated herein as **Exhibit F** is a true and correct copy of his deposition transcript, and **Exhibits 33-35, 37-38, and 40** from that deposition.

10. Defendant Michael Walczak was not deposed. It was reported to me by Attorney Sam Berg that Mr. Walczak is very ill and was recovering from surgery. Attached hereto and incorporated herein as **Exhibit G** is a true and correct copy of a series of emails between myself and Attorney Berg, identifying Mr. Walczak's illness and inability to depose Mr. Walczak on a timely basis prior to the filing of Defendants' motion for summary judgment.

Executed this 12th day of August, 2019.

/s/Nathaniel Cade, Jr.
Nathaniel Cade, Jr.